

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO. 18-CR-80100-RLR

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LANNY FRIED,

Defendant.

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**MOTION TO DELAY SURRENDER**

COMES NOW, the Defendant, LANNY FRIED, by and through his undersigned attorney, and moves this Honorable Court to enter an order delaying his surrender to federal custody and as grounds states the following:

1. The Defendant was sentenced on December 18, 2018, to a term of fifty-seven (57) months imprisonment.
2. The Defendant has been instructed to surrender on April 1, 2019 by noon.
3. As Sentencing, the undersigned specifically requested the above-mentioned date because it was strongly believed that the Defendant, who has been working very closely on several projects for Lamar Odom, would have all of the projects completed.
4. However, the Defendant has not yet completed said projects and is therefore requesting that his surrender be delayed at least until May 3, 2019. Attached hereto as Exhibit A is a letter from Mr. Odom which outlines the pending projects, the benefit for the government and the requested extension date.

5. The Defendant is also attending therapy sessions for gambling addiction at Compass Heath twice a month and would like to complete his therapy (two more sessions).
6. Undersigned counsel reached out to Assistant United States Attorney Ann Marie C. Villafana but she has not given her position.
7. This motion is filed in good faith and not for the purpose of delay.

WHEREFORE, the Defendant, LANNY FRIED, respectfully requests that this Honorable Court enter an order delaying her surrender to federal custody in the above-styled cause.

Respectfully submitted,

SAAM ZANGENEH, P.A.  
14 Northeast 1<sup>st</sup> Avenue, Suite 300  
Miami, Florida 33132  
Telephone: (305) 441-2333  
Facsimile: (305) 908-8693  
Email: saam@zangenehlaw.com

/s/ *Saam Zangeneh*  
By: Saam Zangeneh, Esq.  
Fla. Bar No.: 526721

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been electronically filed this 25<sup>th</sup> day of March, 2019, with the Clerk of Court through CM/ECF.

/s/ *Saam Zangeneh*  
Saam Zangeneh, Esq.